

SYN. NO. _____

AGN. NO. _____

MOTION BY SUPERVISORS ZEV YAROSLAVSKY AND
GLORIA MOLINA

March 6, 2007

The Southern California Association of Governments (SCAG) is responsible for developing the Regional Housing Needs Assessment (RHNA) that sets quantified housing construction goals and the fair-share housing allocation for the SCAG region's 187 cities and 6 counties. The draft RHNA numbers currently require that 57,502 housing units be built in the unincorporated areas of Los Angeles County over the next 8 years. Unfortunately, this figure is based on faulty methodology that overestimates projected household growth in the unincorporated areas and improperly ignores at least two large annexations to the City of Santa Clarita. The RHNA is an important tool in intelligently planning for our future and it is important that it be correctly calculated.

WE, THEREFORE, MOVE that the BOARD OF SUPERVISORS:

- 1) instruct the Director of Planning to submit the county's RHNA appeal to SCAG by the March 15, 2007 deadline for filing appeals; and,
- 2) authorize the Chairman of the Board to sign the "Fourth Cycle RHNA Appeal Request" form and a letter to SCAG outlining the County's statement of appeal.

S: bs\Motions\ SCAG appeal

MOTION

| | |
|-------------|-------|
| MOLINA | _____ |
| BURKE | _____ |
| KNABE | _____ |
| ANTONOVICH | _____ |
| YAROSLAVSKY | _____ |

March 6, 2007

Mark Pisano, Executive Director
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

Dear Mr. Pisano:

**SUBJECT: APPEAL OF THE REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)
ALLOCATION BY LOS ANGELES COUNTY**

This letter serves as Los Angeles County's formal request to appeal SCAG's Regional Housing Needs Assessment (RHNA) allocation to Los Angeles County of 57,502 units.

The County considers this allocation an unrealistic goal and bases its appeal on two methodological issues: 1) the data from annexations of land area from unincorporated Los Angeles County to the incorporated City of Santa Clarita is not properly divested from the County's population, household, and employment projections; and 2) the Regional Transportation Plan (RTP) 2007 Integrated Growth Forecast, which serves as the foundation for the RHNA, overestimates growth in several unincorporated areas of Los Angeles County.

The County's desired outcome is a reduced RHNA allocation of 52,771 units, which is a reduction of 4,731 units (804 units for annexations + 3,927 units for the forecast = 4,731).

Annexation Data Issue

Three annexations from unincorporated Los Angeles County to the incorporated City of Santa Clarita that took place in 2006 – Stonecrest, Northpark, and California Canyons, are not factored into the population, household, and employment projections of SCAG's Integrated Growth Forecast. Specifically, the units for these areas are inappropriately included as part of the Los Angeles County RHNA allocation, rather than included in the City of Santa Clarita RHNA allocation.

The County has identified the numerical correction to the RHNA allocation for these annexations at the census tract level. The table on the following page highlights the requested downward revision to the RHNA of 804 units.

Annexations from LA County to the City of Santa Clarita, 2006

| Annexations (census tract) | SCAG HH 2003 | SCAG HH 2014 | Increment of Growth |
|--|---------------------|-----------------|------------------------|
| Northpark (9201.09) | 463 | 828 | 365 |
| Stonecrest (9108.10) | 516 | 872 | 356 |
| California Canyons (9108.08)** | 68** | 114** | 46 |
| | HH Total: | | 767 |
| Vacant unit estimate (3.5%) | | | 27 |
| Replacement unit estimate | | | 10 |
| | Housing Unit Total: | | 804 |
| <i>** The California Canyons annexation was for 68 units and covers only a portion of the census tract. 46 units is the estimated increment of growth for the annexed area (SCAG staff).</i> | | | |

Integrated Growth Forecast Issue

In a comment letter to SCAG dated January 11, 2007, the County outlined specific areas for suggested downward revisions to the population and household projections by census tract and unincorporated area. The areas included Altadena, Charter Oak, East Irwindale, South San Jose Hills, East Los Angeles, West Whittier, Las Virgenes, and the Antelope Valley, which are not anticipated to have the intensity of growth as projected in the Integrated Growth Forecast.

The County requested an overall RHNA revision from the draft allocation of 63,213 units to 53,575 units (-9,638 units) and SCAG responded by lowering the RHNA to 57,502 (-5,711 units). A further downward revision of 3,927 (-5,711 + -3,927= -9,638) units is appropriate and necessary to match the County's specific revisions by census tract to the unincorporated areas listed in the comment letter.

If you or your staff has any additional questions, please contact Julie Moore with the Department of Regional Planning at (213) 974-6425.

Sincerely,

ZEV YAROSLAVSKY
 Chairman of the Board
 Supervisor, Third District

ZY: bsl

Enclosure: "Fourth Cycle Regional Housing Needs Assessment Appeal Request" form

c: Ms. Sachi Hamai, Executive Officer, Board of Supervisors
 Mr. Bruce W. McClendon, Director of Planning

Fourth Cycle Regional Housing Needs Assessment Appeal Request

Date: March 6, 2007

County/ Subregion: County of Los Angeles

Jurisdiction: County of Los Angeles

Contact: Julie Moore, AICP, Supervising Regional Planner
Housing Section

Phone #/ Email: (213) 974-6425

APPEAL AUTHORIZED BY:

Name: Zev Yaroslavsky, Chairman, Board of Supervisors
County of Los Angeles

PLEASE CIRCLE BELOW:

Mayor Chief
Administrative City
Officer Manager
(County)

Chair of
County
Board of
Supervisors

Other _____

BASES FOR APPEAL

- ☒ RHNA Methodology
- ☐ AB 2158 Factors (See Government Code Sec. 65584.04 (d))
 - ☐ Existing or Protected Job-Housing Balance
 - ☐ Infrastructure Constraints for Additional Development
 - ☐ Distribution of Household Growth assume for Purposes of Comparable Regional Transportation Plans
 - ☐ Market Demand for Housing
 - ☐ County-City Agreements to Direct Growth toward Incorporated Areas of County
 - ☐ Loss of Units Contained in Assisted Housing Developments
 - ☐ Lands Protected from Urban Development under Existing Federal or State Programs
 - ☐ High Housing Cost Burdens
 - ☐ Housing Needs of Farm workers
 - ☐ County Policies to Preserve Prime Agricultural Land
- ☐ Changed Circumstances

Brief Description of Appeal Request and Desired Outcome:

The County of Los Angeles is appealing the RHNA allocation of 57,502 units based on two methodological issues related to 1) annexations and 2) SCAG's estimation of growth in the unincorporated areas – the Integrated Growth Forecast.

The County's desired outcome is a reduction to the RHNA by 4,731 units, resulting in an allocation of 52,771 units.

List of Supporting Documentation, by Title and Number of Pages:

1. Please see attached letter from Zev Yaroslavsky, Chairman, Board of Supervisors, County of Los Angeles, to Mark Pisano, Executive Director, SCAG.
- 2.
- 3.
- 4.

FOR STAFF USE ONLY:



SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS

File Date _____

Hearing Date _____

Planner _____

SCAG Document Reference # _____

Docs #130287 v1

Fourth Cycle Regional Housing Needs Assessment Appeal Request

Date: _____

County/ Subregion: _____

Jurisdiction: _____

Contact: _____

Phone #/ Email: _____

APPEAL AUTHORIZED BY:

Name: _____

PLEASE CIRCLE BELOW:

| | | | | |
|-------|----------------|---------|-------------|-------|
| | Chief | | Chair of | |
| Mayor | Administrative | City | County | Other |
| | Officer | Manager | Board of | |
| | (County) | | Supervisors | _____ |

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